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SEP 6 1995
FCC MAIL ROOM

September 1, 1995

Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Dear Secretary,

I am writing on behalf of WGME-TV in reference to MM Docket No. 93-48, the Commission's proposed rule making to tighten the regulations contained in the Children's Television Act.

Ever since this Act was instituted in 1990, local, syndicated and network broadcasters have substantially increased the amount and the quality of children's educational and informational programming.

At WGME we strive to acquire and to produce programming that will be beneficial to young viewers. But we also have an obligation to serve *all* viewers with news, information, public affairs and entertainment programming.

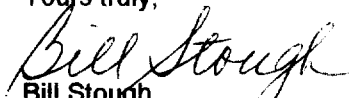
If the Commission decides that a quota system for quantifying the number of hours that a local station must devote to children's educational and informational programming is proper, WGME and stations like it will be forced into serving the public interest, convenience and necessity *only as specifically defined by the Commission!*

Chairman Hundt's recent comment that "It's time to abandon the fiction that asking broadcasters to do better on a volunteer basis has any chance of producing the desired results" is an unfortunate reading of how seriously local television stations view the Children's Television Act. We at WGME feel that the Act is working, that the majority of stations are striving to increase such programming and that quotas are not only unnecessary, but come perilously close to violating broadcasters' First Amendment rights.

WGME opposes new rules that would amend the Children's Television Act. We feel that the Commission should allow local stations to serve their local communities. Local viewers will let us and the Commission know if we are not fulfilling our obligations.

Thank you.

Yours truly,


Bill Stough
President/General Manager

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LEIABODE

WGME-TV  A CBS Affiliate



August 29, 1995

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SEP 6 1995
FCC MAIL ROOM

Secretary
Federal Communications Commission
1919 M. Street, NW
Washington, D.C. 20554

Dear Secretary,

KGAN-TV has a commendable 40 year commitment to kids and kids programming. Producing local origination and buying the best in syndication, parents and kids continue to find our station to be a trusted source of information and entertainment for kids. We target and acquire those young viewers because doing the right thing is also good for our business.

We endorse and comply with the FCC's current rules on kids programming. We oppose the new rule changes up for discussion under MM Docket No. 93-48. KGAN conducts a regular review and audit to assure compliance. Each year we continue to renew and acquire additional "friendly" programs to create a safety margin for ourselves. We have been properly motivated to do all of this without numerical quotas. If you had spelled out the requirements any more specifically, you might have gotten exactly what you asked for. The Children's Television Act is working fine, please reject the rule changes under consideration.

Sincerely,

William S. Anderson
Vice President and Station Manager

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List ABOVE _____

cc FCC: Reed Hundt, James Quello, Andrew Barrett, Susan Ness, Rachelle Chong,
Guy Gannett Communications: Mike Bock

KGAN-TV

600-2 Old Marion Road N.E. • P.O. Box 3131 • Cedar Rapids, Iowa 52406
319/395-9060 • Fax 319/395-0987

A Division of Gannett Communications

DINEEN A. LANCASTER
14432 THOMPSON BOULEVARD
BROOK PARK, OH 44142-2572
216-267-9718

RECEIVED
SEP 6 1995
FCC MAIL ROOM

August 28, 1995

Federal Communication Commission
Office of the Secretary
1919 M Street NW
Washington D.C. 20554

DOCKET FILE COPY ORIGINAL

Reference: ~~WTTW Docket 95-10~~

Mr./Ms. Secretary:

This letter is regarding the state of so called educational & informational television for our nation's children.

My 4 year old son is only allowed to watch our local PBS station channel 25, when he is alone. I must be with him if he wants to watch another station. I do this because I do not trust what the other stations broadcast and I want to be sitting there to screen out the bad or scary programs. I am trying to raise him so he doesn't act like a 15 year old when he turns 7 years old. It isn't right to say all children are growing up fast today, they are because no one is putting a stop to it, they just perpetuate it because everyone else is.

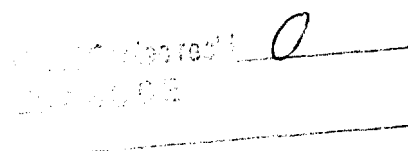
Now-a-days anything goes on television. This is okay during the evening hours, after 9:00 p.m. but it is NOT okay during the daytime and early evening hours. The so called kid shows are nothing but 1/2 hour commercials and only a few actually entertain without violence or with a healthy message. It is amazing that millions of children are entertained each year by quality PBS shows, but that these are not profitable on regular stations. Tell that to the Jim Henson family, they are laughing all the way to the bank. And PBS shows maintain their popularity because they are not some passing fad. Even Disney shows and movies are way to violent in my opinion. If they were cast by real people, not cartoons, some of them would be rated R!!!

Children's programming is in a sad state. A few shows like Beakman's World are actually entertaining and educational at the same time, but these type of shows are few and far between. When will everyone wake up and realize that this is the future generations we are ruining. Has none of these big executives any children or grandchildren?!?! No longer should they be able to pass off Ninja Turtles and Power Rangers as educational. These shows are to violent!!! Some may have a small message at the end but it is lost in all the violence.

But, by far the worse time of any day for any child to be watching TV unsupervised has GOT to be between the hours of 3:00 and 6:00 p.m. I myself as a 30 year old have learned, unfortunately, more disgusting/sexual/violent things by seeing one hour of Geraldo than I have living in the real world. Oprah is the only decent show on. Lets give air time to people who do good and act decent. rather than the small percentage of weirdos!!!

Sincerely,


Dineen A. Lancaster


2/2/96

43-48

From: Jeremy Schlosberg <74431.3422@compuserve.com>
To: FCC <kidstv@fcc.gov>
Date: 9/5/95 11:53pm
Subject: kids tv

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As a parent of three small children, I strongly disagree with the third principle mentioned in your document-- namely:

>broadcasters should be guided by market forces, to the greatest extent possible, in >determining whether they meet their programming obligations

Market forces fail to serve children, period. This is rather blatant reality is mysteriously overlooked by broadcasters, advertisers, and politicians alike, time and again. There is simple proof of this offered every day, whenever there are advertisements on television shows that are watched by children under 6 or

7. There isn't a parent in the land who wants their young children subjected to commercial advertising; there isn't an expert in child development anywhere who would urge children to be exposed to commercial advertising at young ages. And yet, there they are, created by these unimpeachable "market forces": advertisements aimed relentlessly at young children.

It is very disheartening. Children need to be protected from this onslaught. Market forces do nothing but turn up the volume.

Jeremy Schlosberg
Cincinnati OH

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List A B C D E

4348

From: <Gene389@aol.com>
To: A16.A16(kidstv)
Date: 9/5/95 9:52pm
Subject: Children's Television Act

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Hello:

Just read the article in U.S. News that you are asking for public comment on how broadcasters can best fulfill the Children's Television Act.

Why has it taken you people so long to recognize the problem? Where were you when everyone was ridiculing Dan Quail?

It's so simple! Cut out the sexual comments! Tone down the violence. Get back to the basics of entertainment, not titilation.

Hoping for speedy action. E. F. Schneider, 15555 Todd Rd.
Glasford, IL 61533.

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9348

From: <SPRANKLE@att.net>
To: A16.A16(kidstv)
Date: 9/5/95 12:50pm
Subject: Educational programming mandates

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SEP 6 '95

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I appreciate your call for feedback on requiring educational programming commitments by broadcasters as a condition for license renewal. I think it's a great idea. We've already seen what the result is when we allow market forces to determine what is shown on TV: I'd throw out my television before I'd let my kids watch most of it. My suggestion would be an hour of programming appropriate for preschoolers in the morning, and an hour of programming appropriate for school-age children in the afternoon (whatever happened to the ABC Afterschool Specials?). I'd also like to suggest tough, specific, across-the-board standards regulating the content of programs scheduled from 3 to 5 P.M., when older children and teens are most likely to be at home unsupervised. I know anti-regulatory types would scream about this, but the venereal disease and teenage pregnancy rates in our country indicate that our teens are hearing a lot about the fun of sexual activity and not so much about the responsibilities that go along with it--a lot of it, probably, from afternoon soap operas and talk shows. (I work full-time, so I don't really know firsthand what's on these shows, but what I've heard is making me plan to forbid my daughter from watching any TV at all when she's old enough to stay home after school.)

I hope you hear from a lot of other parents about this. I do not advocate censorship, but I think we could all stand to think a little harder about what the programming on TV is telling our kids.

Sincerely,

Catherine Sprankle
 4835 Radcliff Rd.
 Raleigh, NC 27609

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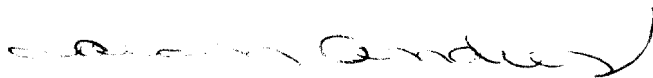
William S. Caton
Acting Secretary, FCC
1919 M Street NW, Room 222
Washington, DC 20554

Dear Mr. Caton,

I am writing in regards to MM Docket 93-48 in support of tougher regulations for childrens' programming. Currently (especially without cable) very little programming suitable for grade school or younger children is available. Evening programming from 7:00-8:30, when most children are watching is filled with sexual innuendo geared toward the adult audience.

Passage of these tougher regulations will be a step toward quality childrens' programming.

Sincerely,



Tara M Andrews

TMA/mh

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2300E

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August 30, 1995

SEP 6 1995

Secretary
Federal Communications Commission
1919 M Street, NW
Washington, D. C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY



RE: Children's Television Act - MM Docket No. 93-48

Dear Secretary,

WYFF Television is an NBC Affiliate serving the Greenville-Spartanburg-Anderson, South Carolina, and Asheville, North Carolina market. We offer a total of four hours of educational/informational programming each week specifically targeted to youth. The programs are:

- "VIDEOMAX" - Local
- "Captain Planet" - Syndicated
- "Jack Hanna's Animal Adventures" - Syndicated
- "California Dreaming" - Network
- "Saved By The Bell" - Network
- "Fastbreak" - Network

"VIDEOMAX" is a locally produced thirty minute program that airs Saturdays at 11 a.m. The program targets youth ages 11-16. "VIDEOMAX" first premiered in March '92 as a monthly show; our goal from the start was to produce a quality program that would showcase positive accomplishments of our local children. We felt to begin monthly and grow to weekly would assure quality; "VIDEOMAX" has been seen weekly since January '95. The South Carolina Broadcasters Association awarded "VIDEOMAX" the Local Children's Programming Award for '95.

Local broadcasters understand the importance of producing quality children's programming. However, if quotas are imposed the end result may be more, but not necessarily better, programs for our children. Every three months WYFF prepares a thorough overview of what we have accomplished to meet and exceed the expectations of the Children's Television Act. The on-air programs are vital; however, the non-broadcast efforts and the short forms of programming produced should not be overlooked or judged to be ineffective.

Here are a few examples from our FCC Second Quarter '95 Report: WYFF News 4 talent and staff personnel collectively participated in 113 outreach events in three months to local students through classroom participating, station tours, tutoring, guest speak appearances, sponsorship of events for youth, i.e. "Special Olympics", "Baby and Children's Expo". For the entire school term News 4 weekly recognized outstanding athletic and academic achievements of our teens through "Prep Spotlight" a 1:45 segment in our 6 p.m. newscast. Public Service Announcements

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Children's Television Act
August 30, 1995
Page Two

1 SEP - 6 1995

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20541

specifically targeted to reach youth with messages such as; stay in school, underage drinking, racism, prom night, drugs, boy and girl scout messages. These messages collectively aired 269 times in a three month period.

The Children's Television Act is and will continue to be successful. It has accomplished the goal of motivating and challenging local broadcasters to be proactive and responsive to the entertainment and educational needs of our children. More rules and/or quotas are not needed at this time.

Sincerely,



David F. McAtee
Vice President/General Manager

DFM/gm

cc: Chairman Reed Hundt
Commissioner James Quello
Commissioner Andrew Barrett
Commissioner Susan Ness
Commissioner Rachelle Chong
NAB Legal Department

11/1/95
11/1/95

WSAZ television 3

WSAZ, Radio Station, Inc., Morgantown, West Virginia 25701 - 304-697-4780

DON RAY
GENERAL MANAGER

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

September 1, 1995

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Secretary
Federal Communications Commission
1919 M St., NW
Washington, DC 20554

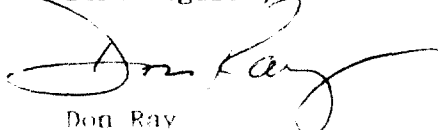
The FCC is considering new rules regarding Children's Television (MM Docket No. 93-48). New rules are not needed at this time. Current FCC rules are working and broadcasters have significantly increased children's educational and informational programming.

Rules quantifying quotas are unnecessary. We are responding to the Children's Television Act without having to meet quotas. Quantification sets a maximum as well as a minimum. This could even serve as a limit to educational programming.

Key elements in broadcasting are reach and frequency. Researchers say a good mix of reach and frequency can be effective as an education tool. Therefore, short form programming is important for kids and should be measured.

Thank you for your consideration.

Best Regards,



Don Ray
General Manager

DR:hr

cc: Reed Hundt, Chairman
James Quello, Commissioner
Andrew Barrett, Commissioner
Susan Ness, Commissioner
Rachelle Chong, Commissioner

NAB

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Hal Capron
Vice President
General Manager

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

August 29, 1995

Mr. William Caton
Secretary
Federal Communications Commission
1919 M St., NW
Washington, DC 20554

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Dear Mr. Caton,

The purpose of my letter is to express my opinion on MM Docket No. 93-48.

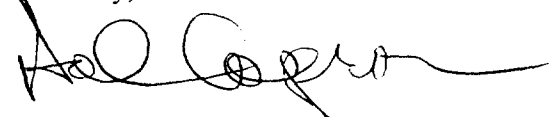
Since the inception of the Childrens Television Act there has been a significant increase in educational and informational programs directed toward and programmed to our children. The act and the current rules are working and no changes are needed.

We broadcasters understand the current definition of what qualifies as "educational and informational children's programming" as demonstrated by the tremendous increase in this type of programming now available.

Rules to quantify (quotas) the amount of programs on the air are unnecessary, and in fact could set a maximum also that may reduce the available programming currently being aired. The fact is that the 30 minute programs airing now along with the short segment programs are doing what the act was designed to do. The short segment give many more opportunities to get educational messages to our children in a much more interesting way.

Why fix something that is not broken?

Sincerely,



Hal Capron
HC/sj

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WNEM Television
1919 M Street, NW
Washington, DC 20554
Phone: (202) 462-1234
Fax: (202) 462-1235

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Paul T. Virciglio
Vice President and
General Manager

August 30, 1995

DOCKET FILE COPY ORIGINAL

Commissioner Andrew Barrett
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Dear Commissioner Barrett:

RE: MM Docket No. 93-48

As you know, broadcasters have significantly increased children's educational and informational programming in response to the Children's Television Act.

Additional rules quantifying (quotas) the amount of educational and informational programming are unnecessary. Quantification sets the maximum as well as the minimum.

The children's act and the current FCC rules are working and when you address MM Docket No. 93-48, I urge your support in determining that new rules are not needed.

Best regards,

Paul T. Virciglio

CC: Mr. Edward O. Fritts
Mr. Henry L. Baumann
Mr. Charles E. Sherman

10/10/95
10/10/95

Meredith



SEP - 6 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

August 29, 1995

Secretary
Federal Communications Commission
1919 M. Street, NW
Washington, D.C. 20554

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Dear Secretary,

KGAN-TV has a commendable 40 year commitment to kids and kids programming. Producing local origination and buying the best in syndication, parents and kids continue to find our station to be a trusted source of information and entertainment for kids. We target and acquire those young viewers because doing the right thing is also good for our business.

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Sincerely,

William S. Anderson
Vice President and Station Manager

Mr. of Communications
100-100-100

cc FCC: Reed Hundt, James Quello, Andrew Barrett, Susan Ness, Rachelle Chong,
Guy Gannett Communications: Mike Bock

KGAN-TV

600-2 Old Marion Road N.E. • P.O. Box 3131 • Cedar Rapids, Iowa 52406
319/395-9060 • Fax 319/395-0987
A Division of Guy Gannett Communications

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SEP.- 6 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

WK 47.1 / 17

WAYNE M. MARTIN
President/General Manager

A CBS AFFILIATE

August 29, 1995

Secretary
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Dear Secretary:

In regards to FCC "MM Docket No. 93-48, I would like to voice my opposition to the new FCC rules, including possibly setting numerical "quotas." The Children's Television Act and the current FCC rules are working to increase children's programming and new rules are unnecessary. Station's are averaging over four and one-half hours of regularly scheduled children's educational and informational programs per week. This leads me to believe that broadcasters are certain of their obligations and are taking their responsibility seriously. Surveys suggest the amount of regularly scheduled and informational children's programming (30 minutes in length or longer) has increased dramatically (over 80%) since the Children's Television Act went into effect.

Broadcasters' understand that the FCC wants to ensure the primary objective of children's shows is educational and informational, and entertainment concerns take a secondary role. The FCC, however, should consider that when children do not enjoy shows, they do not watch them. And when they're not watching, they're not learning. Can broadcasters afford to produce "educational" shows that kids won't watch simply to fulfill a mandate based upon a subjective definition? Few stations can afford to do locally produced educational programs, so most rely on distributors and the network.

The FCC should also take into consideration that not only are broadcasters airing two to four hours of educational programming per week - but spending huge sums with distributors. Stations are buying programs designed to spur interaction between

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Street Address: 2851 Winchester Road, Lexington, Kentucky 40509

Mailing Address: P.O. Box 55037, Lexington, Kentucky 40555 (606) 299-0411 Fax (606) 299-3814

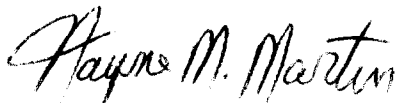
Secretary
Federal Communications Commission
Page 2

stations and schools to serve and educate the children in their areas. "Student Body," "Weatherschool," and "News 101," are just a few of the avenues used to provide information about nutrition, fitness and weather. Stations supply free educational kits and software to participating schools and teach students the use of broadcast equipment to write, shoot, and edit news stories of interest to teens. (Note: WKYT-TV participates in all the above).

Short-subject programs can be educational. When dealing with attention spans of children, (it's a matter of diversity and the variety of programming), educational wraparounds can be highly effective in pure entertainment programs. Public service spots rotated within our highest-rated entertainment programs, expose large numbers of children to critical concerns such as: safety tips for latchkey children, how to answer the phone when you are home alone, or to acceptance of individual differences by portraying physically challenged youngsters.

Rules quantifying the amount of programming for children are unnecessary -- broadcasters are responding to the Act and their obligations.

Sincerely,

A handwritten signature in black ink, reading "Wayne M. Martin". The signature is written in a cursive, flowing style.

Wayne Martin
President and General Manager

cc: Chairman Reed Hundt
Commissioner James Quello
Commissioner Andrew Barrett
Commissioner Susan Ness
Commissioner Rachelle Chong
NAB

KOLR 10

Independent Broadcasting Company
Post Office Box 1716
Springfield, Missouri 65801-1716
(417) 862-1010

Ellis Shook, Vice President
General Manager

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SEP - 6 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

August 31, 1995

Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

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RE: MM Docket No. 93-48

To Whom It May Concern:

This letter is with reference to the proposed rule making dealing with the "Children's Television Act" and further rule making by the FCC.

It is my sincere hope that you will drop or severely modify your plans for additional regulations about Children's Television Programming.

First of all, there have been numerous studies showing that the age group that you are talking about is extremely difficult to reach on television. Most of the programming seems to satisfy adults, but the children are not there to watch it. That does not mean we should not do children's programming that is meaningful, but over the last couple of year's broadcasters have manifestly demonstrated that they are doing much more programming that deals with "educational and informational children's programming."

I would urge you to take a much more contemporary approach to television and take advantage of its strengths which are primarily being "intrusive." That is a term that generally is applied to commercials, but if you would give program recognition to thirty, sixty, ninety or two minute messages that really address the area of educational and informational programming, these announcements would find the children who are watching sitcoms, dramatic shows, children's programming or any other program forms where children are watching.

It is very difficult to quantify quality. Since 1934 we have not been able to define the "public convenience interest and necessity." Isn't there a lesson to be learned from that?

Page 2

Another major point is to find a way to address those few broadcasters who are not fulfilling the intent of the law and the rules. Don't simply create a new set of problems for those broadcasters who are doing a good job, and find a way to recognize and encourage them.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ellis Shook". The signature is fluid and cursive, with the first name "Ellis" and last name "Shook" clearly distinguishable.

Ellis Shook
General Manger

ES:ms

cc: Chairman Reed Hundt
Commissioner James Quello
Commissioner Andrew Barrett
Commissioner Susan Ness
Commissioner Rachelle Chong



ALABAMA'S NEWS SOURCE

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SEP - 6 1995

12 EAST DELANO AVENUE, MONTGOMERY, ALABAMA 36105 • 334 / 288-1212

September 1, 1995

DOCKET FILE COPY ORIGINAL

Mr. William F. Caton, Secretary
Federal Communications Commission
1919 M St., N.W., Room 222
Washington, D.C. 20554

Dear Mr. Caton:

I am very concerned that the FCC is considering a change in the Children's Television Act (MM Docket No. 93-48), which would possibly establish numerical "quotas" for educational and informational children's programming. Over the last several years, broadcasters have significantly increased children's programming in response to the Children's Television Act.

WSFA in Montgomery, Alabama has and does broadcast programs that serve children's needs. Consider the following examples:

"Nick News" - *An award winning magazine show for children, hosted by veteran journalist, Linda Ellerbee. The program is recommended for viewing by the National Education Association.*

"Bill Nye, The Science Guy" - *This show makes fun with fast-paced, outrageous demonstrations and hilarious humor. The program combines the excitement and surprises kids love with the enriching learning experience the Children's Television Act sought to encourage. Additionally, Bill Nye enjoys the full support of the National Science Foundation.*

The entire NBC Saturday morning lineup, which includes "Name Your Adventure," "Saved by the Bell," "Hang Time," and "California Dreams," is broadcast weekly. These shows deal with a wide range of subjects which affect the youth of America.

"Get A Clue" - *In addition to these programs, we are working with our seven "sister" stations in the Cosmos Broadcasting family to produce an educational children's show called "Get A Clue." In just a few*



ANALYST
DATE

Model of Clue read
DATE

5

Mr. William F. Caton, Secretary
September 1, 1995
Page 2

short weeks, we will broadcast our first show, which teaches children about ship navigation by taking them on a scavenger hunt that is all linked to their local library, computers, and a mythical pirate.

Examples of general audience programming which contributes to satisfying children's educational and informational needs include:

"NBA Inside Stuff"
"National Geographic" specials
"Rediscovery of the World" specials

I also believe broadcasters deserve and must get credit for short segment programming and non-broadcast efforts, which are extremely important in getting messages out to our children and grandchildren.

WSFA's efforts in these areas that certainly support the Children's Television Act range from "The More You Know" campaign to a special arrangement with a local cable system to broadcast the very popular "Disney Afternoon" programming. An explanation of examples follows:

"The More You Know" - January 1995 marked the launch of NBC's third annual "The More You Know About Violence Prevention" campaign effort. This effort focused on issues surrounding violence prevention, family violence, and conflict resolution. A Poster/Study Guide was developed by NBC and distributed to principals of all public and private junior high schools, as well as to legislators across the county. This Poster/Study Guide focused on youth violence as an epidemic in our society.

"30 Years of National Geographic Television" - A study guide was developed and provided by National Geographic Television in cooperation with NBC. The guide included a program summary, education objectives, and a list of classroom activities for students.

WSFA has negotiated with Buena Vista Television for the "Disney Afternoon" of children's cartoons and "Sing Me A Story at Belle's Book & Music Shop," which we provide to TCI Cable of Alabama to air on their local origination channel (3). The afternoon slate airs 2:30-4:30 p.m., Monday-Friday, and "Belle's Book and Music Shop" airs Sundays, 8:00-8:30 a.m.

Mr. William F. Caton, Secretary
September 1, 1995
Page 3

Informative tips and behavioral messages under the title "Inspector Detector," which were produced by the local Kiwanis Club, are aired during the "Disney Afternoon" commercial breaks. These informative messages are also aired on WSFA's highly watched morning show, "Today In Alabama."

The programs we have offered as examples are just a few of the efforts we are making for the children in our viewing area. In addition, we broadcast a number of public service announcements targeted specifically for children.

I hope you will agree that our efforts to reach and educate the children in our community reflect what is happening in the television industry. We do not need more regulations to tell us what or how much to broadcast for our young viewers. We are providing a variety of educational children's programming on our own. We understand the current definition of educational and informational children's programming and are meeting that challenge with enthusiasm!

Think of how well this act is working before you change to a system that measures only the bulk of product and does not recognize the quality or relevance of the effort. Stations like WSFA-TV are making a significant and effective contribution to our children and we request that you not change that which is working.

Cordially,

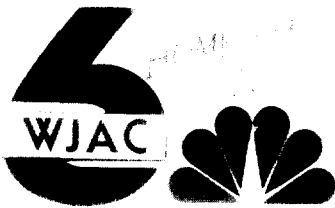
WSFA



J. Harold Culver
Vice President & General Manager

JHC/tw

cc: Chairman Reed Hundt
Commissioner James Quello
Commissioner Andrew Barrett ✓
Commissioner Susan Ness
Commissioner Rachelle Chong



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SEP - 6 1995

August 31, 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Secretary
Federal Communications Committee
1919 M Street, NW
Washington, DC 20554

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RE: MM Docket No. 93-48

Dear Mr. Secretary:

We would like to express our concern over the proposed rulemaking to considerably tighten the rules implementing the Children's Television Act, including possible setting numerical quotas for educational and informational children's programming.

The area of children's television is one of extreme importance and high visibility, given it's statutory basis. As broadcasters, we can expect that the FCC will go to great lengths to enforce the standards set forth in the Act. It is for this reason that WJAC and our fellow broadcasters have significantly increased children's educational and informational programming voluntarily. Therefore, rules quantifying the amount of required programming are unnecessary.

The definition of "educational and informational programming" is another area for proposed changes. However, broadcasters have a solid understanding of the expansive definition set forth in the act and follow the guidelines with the utmost integrity. In no way do broadcasters see the current definition as an open door to manipulate the purpose of the Act.

In conclusion, local broadcasters do recognize their obligation to serve their young viewers. For many years they have done so with pride and this will continue far into the future. The Act and the current FCC rule are working therefore enacting a change is simply not necessary.

Sincerely,

Vicki Turjan
Program Director

cc: Chairman Reed Hundt
Commissioner James Quello
Commissioner Andrew Barrett
Commissioner Susan Ness
Commissioner Rachelle Chong

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Commissioner Andrew Barrett
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

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RE: MM Docket No. 93-48

Dear Commissioner Barrett:

The California Broadcasters Association is **very strongly opposed** to the proposed "tightening" of the Children's Television Act.

The primary reason new proposed rules are not needed is because we are happy to report broadcasters have **already significantly increased educational and informational programming**. Additionally, such programming is going to be increased even more.

Implementing a "quota" system flies in the face of the public's control of the airwaves through their needs and desires as consumers.

Also, short segment programming should get credit because it is:

1. Important
2. Has more impact because of a child's attention span

Broadcasters understand the importance of the Children's Television Act. That's why we are responding so well. The Children's Television Act will do the job if it is allowed to do so. **No further rules are needed.** Thank you.

Sincerely,

Dino Corbin
President

Stan Statham
Executive Director